

WILMERHALE

October 2, 2020

Matthew T. Martens

VIA ECF AND EMAIL

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The Honorable Lois H. Goodman  
United States Magistrate Judge  
United States District Court  
for the District of New Jersey  
Clarkson S. Fisher Federal Building  
402 E. State Street  
Trenton, New Jersey 08608

Re: *Sterk v. The Bank of Nova Scotia*, No. 20-cv-11059; *Alishaev v. The Bank of Nova Scotia*, No. 20-cv-11329; *Tomasulo v. The Bank of Nova Scotia*, No. 20-cv-12111; *Braun v. The Bank of Nova Scotia*, No. 20-cv-12217; *Tran v. The Bank of Nova Scotia*, No. 20-cv-12261; *Serri v. The Bank of Nova Scotia*, No. 20-cv-12927; *Blankenship v. The Bank of Nova Scotia*, No. 20-cv-12998; *Port 22 LLC v. The Bank of Nova Scotia*, No. 20-12999; *Lamborn v. The Bank of Nova Scotia*, No. 20-cv-12999; *Robert Charles Class A LLP v. The Bank of Nova Scotia*, No. 20-cv-13116

Dear Judge Goodman:

I write on behalf of The Bank of Nova Scotia, Scotia Capital (USA) Inc., Scotia Holdings (US) Inc., Scotiabanc Inc., and The Bank of Nova Scotia Trust Company of New York (collectively, “BNS Defendants”) and in connection with the above-captioned cases.

We have been conferring with counsel for plaintiffs in the ten putative class actions pending in this district and, formerly, in other districts regarding acceptance of service and a proposed schedule for plaintiffs’ filing of a consolidated complaint and defendants’ response, as well as other matters, including discovery. Recently, there have been efforts by some plaintiffs’ counsel to effect service on some of the defendants in some of the actions. Accordingly, pursuant to Local Civil Rule 6.1, and to foster the orderly conduct of this litigation and conserve the resources of the Court and the parties, we respectfully request that the Court stay all deadlines for defendants to respond to any of the complaints in the above-captioned actions *sine die* pending the Court’s decision on the parties’ joint proposal concerning scheduling, which the parties expect to submit to the Court within 10 business days after the appointment of lead counsel.

All parties consent in this request. No other requests for extension have been submitted to the Court in this matter.

In submitting this request, the BNS Defendants do not intend to waive, and do not waive, any of their defenses, including those based on lack of personal jurisdiction.

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Respectfully submitted,

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